
Defendant.

[SUBMITTED IN COMPLIANCE WITH
LR 26-1(b)]

1 **March 21, 2022** [March 19 being a Saturday]. The requirements of F.R.C.P. 26(a) (2) (B) shall
2 apply to any such disclosures.

3 (4) Dispositive Motions. Dispositive motions shall be filed not later than thirty (30)
4 days after the discovery cut-off date: Wednesday **May 18, 2022**.

5 (5) Pretrial Order. The Joint Pretrial Order shall be filed not later than thirty (30) days
6 after the date set for filing dispositive motions: Thursday **June 16, 2022**. However, in the event
7 that dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended
8 until thirty (30) days after a decision on the dispositive motions or further order of the Court.
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10 (6) Rule 26(a) (3) Disclosures. The disclosures required by Rule 26(a) (3) and any
11 objection thereto shall be included in the Pretrial Order.

12 The parties will make their Initial Disclosures on or before **January 7, 2022**. No changes
13 need to be made in the timing, form or requirements for such disclosures.
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15 (7) Electronically Stored Information. The parties have undertaken efforts to retain
16 any electronically stored information relevant to this matter and have agreed that, unless the
17 requesting party asks for a definite and specific form, the party producing any electronically
18 stored information need not provide such information in any certain form as long as the form
19 provides the other party (ies) reasonable access to the information. The parties have further
20 agreed that, to the extent any party seeks electronically stored information that would be
21 cumulative, burdensome or unduly costly to produce, counsel for the parties will confer in good
22 faith to reach a mutual agreement regarding the production of such information.
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24 (8) Protection of Privileged/Trial Preparation Materials. The parties prefer to handle
25 these issues on an ad hoc basis as no consensus can be reached in advance.

26 (9) Subjects on Which Discovery Will be Conducted. The parties are in agreement
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1 that discovery will be needed on the Plaintiff's claims, Defendants' denials and the affirmative
2 defenses raised in the Answers. No changes should be made on the limitations of discovery
3 imposed under Federal Rules of Civil Procedure or local rules.

4 (10) Alternative Dispute Resolution. The parties certify they have met and conferred
5 about the possibility of using alternative dispute-resolution processes including mediation,
6 arbitration and early neutral evaluation.

7 (11) Alternative Forms of Case Disposition. The parties certify they have considered
8 consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed.R.Civ.P. 73 and the use of
9 the Short Trial Program (General Order 2013-01)

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1 (12) Electronic Evidence. The parties certify they have discussed whether they intend
2 to present evidence in electronic format to jurors for the purposes of jury deliberations.
3 Discussions between the parties will be ongoing as the trial date approaches and any electronic
4 evidence will be presented in a format compatible with the court's electronic jury evidence
5 display system.
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7 Discovery does not need to be conducted in phases or limited or focused on particular
8 issues.

9 /s/ James P. Kemp
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18 IT IS SO ORDERED:

19 William G. Cobb
20 UNITED STATES MAGISTRATE JUDGE

21 Dated: January 3, 2022
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